



MOBILE COUNTY EMERGENCY MANAGEMENT AGENCY

348 North McGregor Avenue
Mobile, Alabama 36608
(251) 460-8000

May 29, 2012

Roberto Mussenden
Public Safety and Homeland Security Bureau
Federal Communications Commission
445 12th Street, SW
Washington, DC 20554

RE: **License WSL575**
Request for Waiver

Dear Mr. Mussenden,

Mobile County Emergency Management Agency serves as the Emergency Management Agency and as the single point of contact for Homeland Security, for all of the County of Mobile and all of the Municipalities therein. In this capacity, Mobile County EMA controls, and or uses, all the major Warning, Alerting, and Notification systems used by the County. This includes the local Emergency Alert System (EAS), over which we initiate Warnings and Alerts to our local broadcast stations, schools, and Public Agencies, Telephone notification system, and Outdoor Warning Siren System. We have also applied to FEMA for admission to the IPAWS COG program, and hope soon to be able to use the CMAS program as well.

As you can see, we try to have every means available to warn and alert our citizens to the many hazards we face. We are a major port city, and at the intersection of two major interstate systems, I-10 and I-65. We have many plants and industrial facilities in our county which produce and use many hazardous materials, all of which are transported over the port facilities, rail, and interstate systems. We also have a good deal of onshore and offshore gas production, which is called sour gas because it contains dangerous levels of Hydrogen

Sulphide. This gas is produced on several offshore production platforms which are located near the Town of Dauphin Island; a small offshore island exposed not only this technological hazard but natural hazards from the weather as well. One major warning system available to warn our citizens of any danger to them from these hazardous material releases, the approach of extreme and dangerous weather, or any other threat, is our Outdoor Warning Siren System. Even though new technology has opened up new avenues to warn and alert our citizens, we still believe this older warning system does have value, and does have a place in our warning plans. The experience of some of the other parts of our state in the tornadoes last year supports our view. We feel this system is effective in quickly alerting people in outdoor areas such as sports complexes, beaches, shopping centers, schools, downtown areas, and similar areas, to head indoors and seek safe shelter and take protective actions. Our policy is to only use our sirens in conjunction with our Emergency Alert System.

Our Outdoor Warning Siren System consists of forty six sirens, of varying makes and models and vintage. However, they are all controlled and commanded over one common UHF repeater.

Hence, my reason for writing you; we are aware of the FCC mandated narrowbanding, and its deadline of January 1, 2013, and understand and agree with the need for this. We have attempted to find a solution to the challenge that narrowbanding presents to us in these times of financial constraints, as have many others. To address this problem, we have applied to the Federal Emergency Management Agency, through our Alabama Department of Homeland Security, for the funds to replace the older original UHF repeater with a new repeater capable of narrowband, and replace the receiver and or transceiver in each siren with the appropriate new narrowband capable unit from the original equipment manufacturer. We enclose copies of these grant applications for your review.

We do have some sirens which have been installed since Hurricane Katrina, and these newer units have receivers which are capable of being reprogrammed for narrowband operation, but most of them are older sirens which were installed long before the narrow banding mandate became known to us.

Hence, we respectfully request a waiver on the narrow banding mandate deadline until we can hear back from FEMA on our grant applications. We understand that the review and approval process by the state agency, and then by FEMA, can take some time. We feel that granting this request is in the public interest, as it will enable us to keep this important warning and alerting service in operation to serve the public safety.

We also feel that there should be no problem with any interference issues in granting this request. We have never experienced any interference complaints to or from our system, and further, we only test this system for one minute each month, and usually only have to use it in a real emergency a few times in year when our local office of the National Weather Service places our county under a Tornado Warning, or when requested by our first responders for a hazardous materials incident. The actual transmission to set off the sirens takes only a few seconds, and when the sirens with two way capability are polled this takes on a few minutes after a monthly test. In the event of an extreme emergency which would damage our main communications system, which is trunked, we could use this repeater for backup communications, but so far we have never had to do this, even after Hurricane Katrina.

Mobile County Emergency Management Agency requests that the Commission find this request to be in the public interest and grant the application, as submitted.

Thank you in advance for your consideration,

Respectfully submitted,

A handwritten signature in black ink, appearing to read 'Ronnie Adair', with a stylized, cursive script.

Ronnie Adair
Director
Mobile County Emergency Management Agency

Attachments:

License WSL575
Hazard Mitigation Grant Program Application for Narrow Band Repeater
Hazard Mitigation Grant Program Application for Narrowbanding 46 sirens



Federal Communications Commission
Public Safety and Homeland Security Bureau

RADIO STATION AUTHORIZATION

LICENSEE: MOBILE, COUNTY OF

MOBILE, COUNTY OF
348 N MC GREGOR AVE
MOBILE, AL 36608

Call Sign WSL575	File Number 0004749199
Radio Service PW - Public Safety Pool, Conventional	
Regulatory Status PMRS	
Frequency Coordination Number	

FCC Registration Number (FRN): 0004242384

Grant Date 06-02-2011	Effective Date 06-02-2011	Expiration Date 08-11-2021	Print Date 06-02-2011
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STATION TECHNICAL SPECIFICATIONS

Fixed Location Address or Mobile Area of Operation

Loc. 1 Address: 348 N MC GREGOR AVE
City: MOBILE County: MOBILE State: AL
Lat (NAD83): 30-42-04.7 N Long (NAD83): 088-08-37.0 W ASR No.: Ground Elev: 64.0

Loc. 2 Address: 7340 ZEIGLER BLVD
City: MOBILE County: MOBILE State: AL
Lat (NAD83): 30-42-27.7 N Long (NAD83): 088-12-51.0 W ASR No.: Ground Elev: 67.0

Loc. 3 Area of Operation
Countywide: MOBILE, AL

Antennas

Loc. No.	Ant. No.	Frequencies (MHz)	Sta. Cls.	No. Units	No. Pagers	Emission Designator	Output Power (watts)	ERP (watts)	Ant. Ht./Tp meters	Ant. AAT meters	Construct Deadline Date
1	1	000453.60000000	FB2	1		20K0F3E	75.000	250.000	100.0		
1	1	000453.60000000	FB	1		20K0F3E	75.000	250.000	100.0		
2	1	000458.60000000	FX1	1		20K0F3E	25.000	40.000	12.0		
3	1	000453.60000000	MO	132		20K0F3E	75.000				
3	1	000458.60000000	MO	132		20K0F3E	75.000				

Control Points

Conditions:

Pursuant to §309(h) of the Communications Act of 1934, as amended, 47 U.S.C. §309(h), this license is subject to the following conditions: This license shall not vest in the licensee any right to operate the station nor any right in the use of the frequencies designated in the license beyond the term thereof nor in any other manner than authorized herein. Neither the license nor the right granted thereunder shall be assigned or otherwise transferred in violation of the Communications Act of 1934, as amended. See 47 U.S.C. § 310(d). This license is subject in terms to the right of use or control conferred by §706 of the Communications Act of 1934, as amended. See 47 U.S.C. §606.